

Gregory Kafoury, OSB No. 741663

kafoury@kafourymcdougal.com

Mark McDougal, OSB No. 890869

mcdougal@kafourymcdougal.com

Jason Kafoury, OSB No. 091200

jkafoury@kafourymcdougal.com

Kafoury & McDougal

411 SW Second Avenue, Suite 200

Portland OR 97204

Phone: (503) 224-2647

Fax: (503) 224-2673

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

CHRISTOPHER GARZA,

Plaintiff,

vs.

CITY OF SALEM, an Oregon municipal corporation; and OFFICER DAVID BAKER, an individual,

Defendants.

Case No. 3:22-cv-00721-HZ

PLAINTIFF'S PROPOSED FORM OF
VERDICT

Plaintiff requests the attached proposed form of verdict.

DATED this 2nd day of October, 2023.

KAFOURY & MCDOUGAL

/s/ *Jason Kafoury*

Jason Kafoury OSB# 091200
jkafoury@kafourymcdougal.com
Of Attorneys for Plaintiff

Gregory Kafoury, OSB No. 741663

kafourymcdougal.com

Mark McDougal, OSB No. 890869

mcdougal@kafourymcdougal.com

Jason Kafoury, OSB No. 091200

jkafoury@kafourymcdougal.com

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

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CHRISTOPHER GARZA,

Case No. 3:22-cv-00721-HZ

Plaintiff,

VERDICT

vs.

CITY OF SALEM, an Oregon municipal corporation; and OFFICER DAVID BAKER, an individual,

Defendants.

I. Excessive Force

1. On plaintiff's claim for Excessive Force against Officer Baker, do you find in favor of plaintiff or defendant?

ANSWER: Plaintiff _____

Defendant _____

If you found for plaintiff on Question 1, proceed to Questions 2 and 3. If you found for defendant on Question 1, skip to Question 4.

2. What are plaintiff's damages?

ANSWER: Noneconomic Damages: _____

Economic Damages: _____

3. What amount of punitive damages do you award, if any?

ANSWER: _____

II. False Arrest

4. On plaintiff's claim for False Arrest, do you find in favor of plaintiff or defendants?

ANSWER: Plaintiff _____

Defendants _____

If you found for plaintiff on Question 4, proceed to Question 5. If you found for defendants on Question 4, skip to Question 6.

5. What are plaintiff's False Arrest damages?

ANSWER: Noneconomic Damages: _____

Economic Damages: _____

III. Battery

6. On plaintiff's claim for Battery, do you find in favor of plaintiff or defendants?

ANSWER: Plaintiff _____

Defendants _____

If you found for plaintiff on Question 6, proceed to Question 7. If you found for defendants on Question 6, you are done.

7. What are plaintiff's Battery damages?

ANSWER: Noneconomic Damages: _____

Economic Damages: _____

Dated: November ____, 2023.

Presiding Juror

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PLAINTIFF'S PROPOSED FORM OF VERDICT** on the defendant(s) on the date indicated below by the following method:

- mailing with postage prepaid
- hand delivery
- facsimile transmission
- overnight delivery
- email

to said person(s) a true copy thereof, addressed to said persons at their last known address(es) and facsimile number(s) as follows:

Sebastian Tapia
Salem City Attorney's Office
555 Liberty St SE, Ste 225
Salem OR 97301
stapia@cityofsalem.net
mhighsmith@cityofsalem.net
rgostevskyh@cityofsalem.net

Attorneys for Defendants

Dated this 9th day of October, 2023.

KAFOURY & MCDOUGAL

/s/ Jason Kafoury

Jason Kafoury, OSB #091200
jkafoury@kafourymcdougal.com
Of Attorneys for Plaintiff